

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona
Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

FRANKLIN SANDS,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04447 (SMB)

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: November 17, 2015.
2. Fact Discovery shall be completed by: June 6, 2016.
3. The Disclosure of Case-in-Chief Experts shall be due: August 26, 2016.
4. The Disclosure of Rebuttal Experts shall be due: September 26, 2016.
5. The Deadline for Completion of Expert Discovery shall be: October 25, 2016.
6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before November 1, 2016.
7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before November 15, 2016.
8. The Deadline for Conclusion of Mediation shall be: On or before March 15, 2017.

Dated: New York, New York
September 17, 2015

BAKER & HOSTETLER LLP

Of Counsel:

By: /s/ Nicholas J. Cremona

David J. Sheehan

Nicholas J. Cremona

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

BAKER & HOSTETLER LLP

811 Main Street, Suite 1100

Houston, Texas 77002-5018

Telephone: (713) 751-1600

Facsimile: (713) 751-1717

Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard
L. Madoff*